

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UROLOGY OF ST. LOUIS, INC.,)	
)	
Plaintiff,)	Case No: 2024 CV 01921
)	
v.)	
)	
AMERICAN HEALTHCARE SYSTEMS)	
ILLINOIS LLC and AHS MEDICAL GROUP)	
LLC,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO REMAND**

Defendants, American Healthcare Systems Illinois LLC, and AHS IL Medical Group LLC, (hereinafter “Defendants”), by their counsel, TRIVEDI & KHAN, P.C., and for their Motion for Extension of Time to File Response to Plaintiff’s Motion to Remand, state as follows:

1. On March 6, 2024, Defendants filed their Notice of Removal.
2. On March 18, 2024, Plaintiff filed a Motion to Remand.
3. The proposed briefing schedule filed with the Motion to Remand states that Defendants shall file their response by April 2, 2024.

4. Counsel for Defendants had to deal with multiple arbitration hearing and trials, including but not limited to: *In re: Gina Krol/Itasca Park Place LLC (bankruptcy proceedings); in re: Amy Argentine (ADR hearing), Chauhan v. Patel, (pretrial conference). Paras v. Nitti (party depositions); Elwart et al. v. Jarosz (party depositions)*.

5. Counsel for Defendants request an additional 14 days to complete their response.

WHEREFORE, Defendants respectfully request the Court grant their Motion and extend the response date by 14 days, extend the remaining deadlines accordingly, and for any other relief as deemed necessary and just.

Date: April 1, 2024

Respectfully Submitted,
**AMERICAN HEALTHCARE SYSTEMS
ILLINOIS LLC AND AHS IL MEDICAL
GROUP LLC**

By: *Zubair A. Khan*
One of their attorneys

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